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*Technologies d/b/a Ubiquity, Tre'lage, LLC,*  
8 *Neil Haboush, Neil Sollinger, Mark Soller,*  
*Pasha Sollinger and Nancy LaBier*

9 UNITED STATES DISTRICT COURT  
10 DISTRICT OF NEVADA  
11

12 GAIA BOTANICALS, LLC,

13 Plaintiff,

14 v.

15 PACIFIC PAYMENT TECHNOLOGIES,  
16 LLC d/b/a, UBIQUITY, TRE'LAGE, LLC,  
MARIN RAIN, INC., NEIL HABOUSH,  
17 NEIL SOLLINGER, MARK SOLLER,  
JAMES T. LOVERN, PASHA SOLLINGER,  
18 NANCY E. LABIER, Does 1-50 and XYZ  
Corps., 1-50,

19 Defendants.  
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Case No. 2:18-cv-00789-APG-PAL

**STIPULATION FOR EXTENSION OF  
TIME FOR DEFENDANTS PACIFIC  
PAYMENT TECHNOLOGIES, LLC d/b/a,  
UBIQUITY, TRE'LAGE, LLC, NEIL  
HABOUSH, NEIL SOLLINGER, MARK  
SOLLER, PASHA SOLLINGER AND  
NANCY E. LABIER TO FILE THEIR  
REPLY IN SUPPORT OF MOTION TO  
DISMISS [ECF NO. 32]**

**(SECOND REQUEST)**

Complaint filed: May 1, 2018

21 Plaintiff, Gaia Botanicals, LLC ("Plaintiff"), and Defendants Pacific Payment  
22 Technologies d/b/a Ubiquity, Tre'lage, LLC, Neil Haboush, Neil Sollinger, Mark Soller, Pasha  
23 Sollinger and Nancy LaBier ("Stipulating Defendants"), by and through their respective counsel,  
24 file this Stipulation for Extension of Time for Stipulating Defendants to file their reply in support  
25 of their pending Motion to Dismiss (ECF No. 32). Stipulating Defendants request an extension up  
26 to and including October 12, 2018 to file their reply in support of the pending Motion to Dismiss.<sup>1</sup>

27 <sup>1</sup> This is the second request for an extension as the stipulation entered on August 28, 2018,  
28 provided Stipulating Defendants with two weeks to file their reply from the date of Plaintiff's

1 This stipulation is made in good faith and will not prejudice any party. This stipulation is  
2 requested due to a personal family emergency of lead counsel for Stipulating Defendants,  
3 necessitating his travel out of state.

4 Dated this 2<sup>nd</sup> day of October 2018.

5 LIPSON NEILSON P.C.

NAYLOR & BRASTER

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7  
8 By: /s/ Joshua B. Katz

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By: /s/ Jennifer L. Braster


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Technologies d/b/a Ubiquity, Tre'lage, LLC,  
Neil Haboush, Neil Sollinger, Mark Soller,  
Pasha Sollinger and Nancy LaBier*

15  
16 **ORDER**

17 IT IS SO ORDERED that Defendants Pacific Payment Technologies d/b/a Ubiquity,  
18 Tre'lage, LLC, Neil Haboush, Neil Sollinger, Mark Soller, Pasha Sollinger and Nancy LaBier have  
19 up to and including October 12, 2018 to file their reply in support of the Motion to Dismiss.

20 Dated: October 2, 2018.

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23 UNITED STATES DISTRICT JUDGE

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opposition. (ECF No. 36).